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Attorneys for Defendants
Sunrise Hospital, Nancy Beasley,
Lauren Hendricks, Tina Hayes,
Anthony Keily, Vicky Strauss,
Jeffrey Johnston, Marcelino Tacadena,
and Oscar Chavez

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

ERINDIRA ESPERANZA GUZMAN-
 IBARGUEN, individually; ERENDIRA
 MEJIA-GUZMAN, individually; MARIA
 FERNANDEZ MEJIA-GUZMAN,
 Individually, TAMMY HARLESS as Special
 Administrator for the Estate of OSCAR
 ANICETO MEJIA-ESTRADA

Plaintiffs

vs.

SUNRISE HOSPITAL AND MEDICAL
 CENTER, LLC.; OSCAR CHAVES, RN;
 ERIC S. DENNIS, MD; NANCY BEASLEY,
 RN; ARLAMAY ROGERS, RN; LAUREN
 HENDRICKS, RN; MARCELIINO A.
 TACADENA, RN; TINA HAYES, CNA;
 NURSE STRAUSS, RN; TIEN CHANG
 WANG, MD; DR. WADE SEARS;
 ANTHONY KEILY, JEFFREY JOHNSTON;
 SOUTHWEST EMERGENCY
 ASSOICATES, DOES 1-XX AND ROES 1.-X

Defendants.

CASE NO. 2:10-cv-01983-JCM-PAL
 CASE NO. 2:10-cv-01228-PMP-PAL

CONSOLIDATED CASE NO.
 2:10-cv-01228-PMP-PAL

**DEFENDANT SUNRISE HOSPITAL AND
 MEDICAL CENTER, LLC'S RESPONSE
 TO THE COURT'S ORDER ON
 PLAINTIFFS' MOTION TO COMPEL**

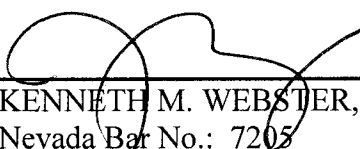
**DEFENDANT SUNRISE HOSPITAL AND MEDICAL CENTER, LLC'S RESPONSE TO
THE COURT'S ORDER ON PLAINTIFFS' MOTION TO COMPEL**

COMES NOW, DEFENDANT SUNRISE HOSPITAL AND MEDICAL CENTER, LLC, by and through its counsel of record of the law firm of HALL PRANGLE & SCHOONVELD, LLC, and hereby produces pursuant to the Court's Order on Plaintiffs' Motion to Compel (#66):

Exhibit A. Affidavit by Laurie Turner, bates stamped AFFT0001 through AFFT0002.

DATED this 10th day of June, 2011.

HALL PRANGLE & SCHOONVELD, LLC


KENNETH M. WEBSTER, ESQ.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of HALL PRANGLE & SCHOONVELD;
that service of the foregoing **DEFENDANT SUNRISE HOSPITAL AND MEDICAL
CENTER, LLC'S RESPONSE TO THE COURT'S ORDER ON PLAINTIFFS' MOTION
TO COMPEL** was made on the 10th day of June, 2011, via facsimile and by depositing a true
copy of the same in a sealed envelope, postage pre-paid, in the United States Mail, and addressed
as follows:

Thomas Christensen, Esq.
David F. Sampson, Esq.
CHRISTENSEN LAW OFFICES, LLC
1000 South Valley View Blvd.
Las Vegas, NV 89107
Attorney for Plaintiffs

LeAnn Sanders, Esq.
Shirley Blazich, Esq.
ALVERSON, TAYLOR, MORTENSEN &
SANDERS
7401 W. Charleston Blvd.
Las Vegas, NV 89117
*Attorneys for Defendants Dennis, MD,
Wang, MD, and Sears, MD*


An employee of HALL PRANGLE & SCHOONVELD, LLC

4848-4941-0825, v. 1

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EXHIBIT “A”

AFFIDAVIT OF LAURIE TURNER

STATE OF NEVADA)
)
COUNTY OF CLARK)

Laurie Turner being first duly sworn, deposes and says:

1. Your Affiant is an employee of Sunrise Hospital and Medical Center, LLC.

2. The following facts are within my personal knowledge and, if sworn as a witness, I could and would competently testify thereto. Everything within my Affidavit is true and correct to the best of my knowledge, information and belief.

3. The Root Cause Analysis was performed by the Patient Safety Committee at Sunrise Hospital and Medical Center, LLC in response to a Sentinel Event that occurred on July 27, 2008 with the patient, Oscar Mejia-Estrada.

4. The Patient Safety Committee was established in compliance with the requirements of NRS 439.875. The Patient Safety Committee conducted its investigation and reporting of this event in accordance with the Nevada Statutes governing sentinel events, reporting of such events, and investigations of those events, NRS 439.800 through NRS 439.890.

5. This incident was determined to be a Sentinel Event pursuant to NRS 439.830, and reported on July 28, 2008 to the Nevada State Health Division, pursuant to NRS 439.835.

6. A mandatory investigation into the Sentinel Event was conducted pursuant to NRS 439.837. This investigation was termed a Root Cause Analysis.

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7. The Root Cause Analysis was presented to the Executive Committee and Board of Trustees Committee/governing body, pursuant to NRS 439.875(4), on September 18, 2008 and September 29, 2008, respectively.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

Laurie Turner
LAURIE TURNER

SUBSCRIBED and SWORN to before me

on this 9 day of June, 2011.

Paula Thornock
NOTARY PUBLIC in and for
County of Clark, State of Nevada



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